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12 Attorneys for Defendants Saxon Mortgage  
13 Services and Deutsche Bank National  
14 Trust Company as Trustee for IXIS Real  
15 Estate Capital Trust 2006-HE1  
16

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 THOMAS KNIPPEL, an individual, and  
14 GLORIA KNIPPEL, an individual,

15 Plaintiffs,

16 v.

17 SAXON MORTGAGE SERVICES;  
18 DEUTSCHE BANK NATIONAL TRUST  
19 CO.; LENDER PROCESSING SERVICES;  
20 LPS DEFAULT SOLUTIONS, INC.; LPS  
21 FORECLOSURE SOLUTIONS, INC.;  
22 QUALITY LOAN SERVICE CORP.;  
23 MCCARTHY & HOLTHUS, LLP; MOSS  
24 CODILIS LLP; DOE Defendants I through X,  
25 inclusive; and ROE CORPORATIONS A  
26 through Z, inclusive,

27 Defendants.  
28

CASE NO. 2:10-cv-001726

**VERIFIED PETITION OF  
THOMAS J. CUNNINGHAM, ESQ. FOR  
PERMISSION TO PRACTICE PRO  
HAC VICE IN THIS CASE AND  
DESIGNATION OF LEAD COUNSEL**

EFFECTIVE NOVEMBER 11, 2010  
FILING FEE IS \$175.00

29 Thomas J. Cunningham, Esq., Petitioner, respectfully represents to the Court:

30 1. Petitioner resides at 5220 Benton, Downers Grove, Illinois 60615.

31 2. Petitioner is an attorney at law and a member of the law firm of LOCKE LORD

32 BISSELL & LIDDELL LLP with offices at 111 South Wacker Drive, Chicago, Illinois 60606 (312)

33 443-0656, tcunningham@lockelord.com.

3. Petitioner has been retained personally or as a member of the law firm by Saxon Mortgage Services, Inc. and Deutsche Bank National Trust Company as Trustee for IXIS Real Estate Capital Trust 2006-HE1 to provide legal representation in connection with the above-entitled case now pending before this Court.

4. Since 1993 Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Illinois where Petitioner regularly practices law.

5. Petitioner was admitted to practice before the following Courts on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

<u>Federal/State Admissions</u>	<u>Status (Active/Inactive)</u>	<u>Date Admitted</u>	<u>Bar Number</u>
State Bar of Illinois	Active	1993	6215928
State Bar of California	Active	2009	263729
United States Supreme Court	Active	1996	
United States Seventh Circuit Court of Appeals	Active	1993	
United States Ninth Circuit Court of Appeals	Active	2008	
United States District Court, Northern District of Illinois	Active	1993	
United States District Court, Central District of Illinois	Active	1996	
United States District Court, Southern District of Illinois	Active	2003	
United States District Court, Western District of Michigan	Active	2002	
United States District Court, Eastern District of Wisconsin	Active	2009	
United States District Court, Central District of California	Active	2009	
United States District Court, Eastern District of California	Active	2009	
United States District Court, Northern District of California	Active	2009	
United States District Court, Southern District of California	Active	2009	

6. There are or have been no disciplinary proceedings instituted against Petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below: Not applicable.

7. Has Petitioner ever been denied admission to the State Bar of Nevada? (If yes, give particulars of every denied admission): No.

8. Petitioner is a member of good standing in the following Bar Associations:

American Bar Association; Los Angeles County Bar Association.

9. Petitioner or any member of Petitioner's firm (or office if firm has offices in more than one city) with which Petitioner is associated has/have filed application(s) to appear as counsel under Local Rule IA 10-2 during the past three (3) years in the following matters:

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
June 22, 2009; December 3, 2009	<i>Goodwin, et al. v. Executive Trustee Services, LLC, et al;</i> Case No. 3:09-cv-00306-ECR	United States District Court for the District of Nevada	Both Granted
July 8, 2009	<i>Lopez, et al. v. Executive Trustee Services, LLC, et al;</i> Case No. 3:09-cv-180-ECR	United States District Court for the District of Nevada	Granted
August 3, 2009	<i>Green, et al. v. Countrywide Home Loans, Inc., et al.;</i> Case No. 3:09-cv-00374-BES	United States District Court for the District of Nevada	Granted
September 17, 2009	<i>Local AD Link, Inc., et al. v. Adzzoo, LLC, et al.,</i> Case No. 2:09-cv-01564-RCJ-L RL	United States District Court for the District of Nevada	Granted
October 2, 2009	<i>Dalton, et al. v. Citimortgage, Inc., et al.;</i> Case No. 3:09-cv-00534-ECR-VP	United States District Court for the District of Nevada	Granted

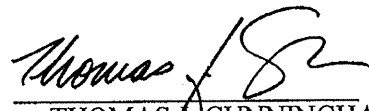
1	July 14, 2010	<i>State of Nevada, et al.</i>	United States District	Granted
2		<i>v. Countrywide Home</i>	Court for the District	
3		<i>Loans Servicing LP, et</i>	of Nevada	
4		<i>al., Case No.</i>		
5		<i>3:10-cv-00419-RCJ-P</i>		
6		<i>AL</i>		
7	September 23, 2010	<i>Abdolhamid Ahmadi</i>	United States District	Granted
8		<i>v. Wilson Resources,</i>	Court for the District	
9		<i>Inc., et al., Case No.</i>	of Nevada	
10		<i>3:10-cv-00587 RCJ</i>		
11		<i>VPC</i>		

10. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

11. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

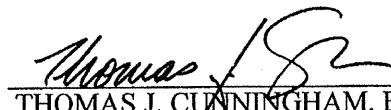
12. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR THE PURPOSES OF THIS CASE ONLY.

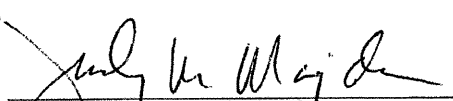
  
THOMAS J. CUNNINGHAM, ESQ.

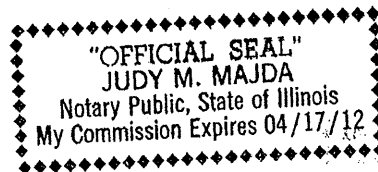
STATE OF ILLINOIS       )  
                                  ) ss:  
COUNTY OF COOK        )

Thomas J. Cunningham, Esq., Petitioner, being first duly sworn, deposes and says: That the foregoing statements are true.

  
THOMAS J. CUNNINGHAM, ESQ.

Subscribed and sworn to before me this  
23rd day of November, 2010.

  
Notary public or Clerk of Court

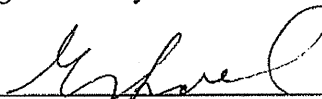



**DESIGNATION OF RESIDENT ATTORNEY  
ADMITTED TO THE BAR OF THIS COURT  
AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Gregg A. Hubley, Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate residence counsel in this action. The address of said designated Nevada counsel is:  
Pite Duncan, LLP  
701 E. Bridger Avenue, Suite 700  
Las Vegas, Nevada 89101  
(702) 991-4632

By this designation the Petitioner and undersigned party(ies) agree that this designation constitutes agreement and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

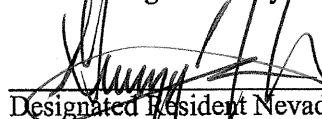
**APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

The undersigned party(ies) appoints Gregg A. Hubley of PITE DUNCAN LLP as its Designated Resident Nevada Counsel in this case.  
Saxon Mortgage Services, Inc.   
Party Signature

Deutsche Bank National Trust Company  
as Trustee for IXIS Real Estate Capital  
Trust 2006-HE1, by  
Saxon Mortgage Services, Inc.   
Party Signature


**CONSENT OF DESIGNEE**

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

  
Designated Resident Nevada Counsel's Signature

# 7386  
Bar number

**UPON THE COURT'S FINDING OF GOOD CAUSE,  
IT IS HEREBY APPROVED** this 2nd day of December, 2010.

  
Gloria M. Navarro  
United States District Judge